

Exhibit 1

From: Ashley Bolt bolt@fr.com
Subject: RE: Headwater v. Samsung, 2:23-cv-641: Samsung Notice and Subp to VIEN-PHUONG NGUYEN
Date: January 10, 2025 at 9:38 AM
To: pkroeger@raklaw.com
Cc: Sara Fish sfish@fr.com, [SERVICE FR] Samsung-Headwater SERVICEFRSamsung-Headwater@fr.com, rak_headwater@raklaw.com, melissa@gillamsmithlaw.com, gschmidt@hilgersgraben.com, gil@gillamsmithlaw.com, Jeannet Santos jsantos@fr.com

Paul,

As just stated regarding Messrs. Green and Lavine, although we understand trial is proceeding on Monday in the first case, we have plenty of bandwidth available to cover the other cases simultaneously. To the extent Headwater does not, as I mentioned below, that is a problem of its own making. Samsung intends to take the deposition of Mr. Nguyen as a named inventor before the close of claim construction discovery on February 7.

If you can promptly provide a deposition date for Mr. Nguyen in advance of February 7, there is no need for us to meet and confer. If not, we will need to find a time.

Regards,
Ashley

Ashley A Bolt

Principal ■ Fish & Richardson P.C.

M: 256 335 9252 | bolt@fr.com

From: Paul Kroeger <pkroeger@raklaw.com>
Sent: Thursday, January 9, 2025 11:55 PM
To: Ashley Bolt <bolt@fr.com>
Cc: Sara Fish <sfish@fr.com>; [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>; rak_headwater@raklaw.com; melissa@gillamsmithlaw.com; gschmidt@hilgersgraben.com; gil@gillamsmithlaw.com; Jeannet Santos <jsantos@fr.com>
Subject: Re: Headwater v. Samsung, 2:23-cv-641: Samsung Notice and Subp to VIEN-PHUONG NGUYEN

Ashley,

Monday is the FIRST DAY OF TRIAL. We are not available

We may talk on Monday, January 20.

Paul Kroeger
(213) 864-5532
pkroeger@raklaw.com

On Jan 9, 2025, at 8:52 PM, Ashley Bolt <bolt@fr.com> wrote:

Paul,

To make sure I understand, is there no date in January on which Mr. Nguyen is available for a deposition?

To the extent Headwater is not available for a timely deposition of Mr. Nguyen, that is a problem of its own making. Headwater chose to file serial cases against Samsung and many other parties, and it must be prepared to keep up with the demands of those cases. Please respond tomorrow with reasonable dates for the deposition of Mr. Nguyen, or provide your availability to meet and confer on Monday so that Samsung may proceed with moving to compel.

Regards,
Ashley

Ashley A Bolt

Principal ■ Fish & Richardson P.C.

M: 256 335 9252 | bolt@fr.com

From: Paul Kroeger <pkroeger@raklaw.com>
Sent: Thursday, January 9, 2025 11:24 PM
To: Ashley Bolt <bolt@fr.com>
Cc: Sara Fish <sfish@fr.com>; [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>;
Cc: rak_headwater@raklaw.com <rak_headwater@raklaw.com>; melissa@gillamsmithlaw.com; gschmidt@hilgersgraben.com; gjl@gillamsmithlaw.com; Jeannet Santos <jsantos@fr.com>
Subject: Re: Headwater v. Samsung, 2:23-cv-641: Samsung Notice and Subp to VIEN-PHUONG NGUYEN

Ashley,

We are working to schedule the deposition in February.

Thanks for your patience

Paul Kroeger
(213) 864-5532
pkroeger@raklaw.com

On Jan 9, 2025, at 8:11 PM, Ashley Bolt <bolt@fr.com> wrote:

Paul,

We have been attempting to schedule a date for Mr. Nguyen's deposition since at least my email of November 26, in response to which you represented (on December 6) that Mr. Nguyen "has limited availability until the end of the year." Please promptly provide the next available day with 7 hours of availability for Mr. Nguyen and any sequential days with less than 7 hours of availability.

I reiterate that it is difficult to understand the inability to find one business day of 7 hours of Mr. Nguyen's time in the month of January, given his role as a named inventor on a patent now asserted by Headwater. February remains over three weeks away, and Samsung is prepared to take this deposition shortly.

Regards,
Ashley

Ashley A Bolt

Principal ■ Fish & Richardson P.C.

M: 256 335 9252 | bolt@fr.com

From: Paul Kroeger <pkroeger@raklaw.com>
Sent: Monday, January 6, 2025 4:10 PM
To: Ashley Bolt <bolt@fr.com>
Cc: Sara Fish <sfish@fr.com>; [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>;
Cc: rak_headwater@raklaw.com<rak_headwater@raklaw.com>;
melissa@gillamsmithlaw.com; gschmidt@hilgersgraben.com; gil@gillamsmithlaw.com; Jeannet Santos <jsantos@fr.com>
Subject: Re: Headwater v. Samsung, 2:23-cv-641: Samsung Notice and Subp to VIEN-PHUONG NGUYEN

Ashley,

Mr. Nguyễn is no longer available in January. We are looking into his availability in February and will advise.

Thanks,

Paul Kroeger
(213) 864-5532
pkroeger@raklaw.com

On Jan 6, 2025, at 12:47 PM, Ashley Bolt
<bolt@fr.com> wrote:

Counsel,

Following up on the below. Samsung remains ready and available to proceed with the deposition of Mr. Nguyen. Please provide his availability for deposition in January, including the next available day with 7 hours of availability and any sequential days with less than 7 hours of availability.

Thanks,
Ashley

Ashley A Bolt

Principal ■ Fish & Richardson P.C.

M: 256 335 9252 | bolt@fr.com

From: Sara Fish <sfish@fr.com>
Sent: Monday, December 30, 2024 3:16 PM
To: pkroeger@raklaw.com
Cc: Ashley Bolt <bolt@fr.com>; [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>;
Cc: rak_headwater@raklaw.com <rak_headwater@raklaw.com>; melissa@gillamsmithlaw.com; gschmidt@hilgersgraben.com; gil@gillamsmithlaw.com; Jeannet Santos <jsantos@fr.com>
Subject: RE: Headwater v. Samsung, 2:23-cv-641: Samsung Notice and Subp to VIEN-PHUONG NGUYEN

Counsel,

Please provide Mr. Nguyen's availability for deposition in January, including the next available day with 7 hours of availability and any sequential days with less than 7 hours of availability. It is difficult to understand the inability to find one business day of 7 hours of Mr. Nguyen's time, given his role as a named inventor on a patent now asserted by Headwater. If Mr. Nguyen does not have any such availability in the month of January, let us know what time you are available for a meet and confer regarding a motion to compel. We are available to confer either this Thursday Jan 2nd or Friday Jan 3rd.

Thank you,

Sara C. Fish

Principal ■ Fish & Richardson P.C. ■ Mobile: 770 403 0377

From: Paul Kroeger <pkroeger@raklaw.com>
Sent: Wednesday, December 11, 2024 7:27 PM
To: Sara Fish <sfish@fr.com>
Cc: Ashley Bolt <bolt@fr.com>; [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>;
Cc: rak_headwater@raklaw.com <rak_headwater@raklaw.com>; melissa@gillamsmithlaw.com; gschmidt@hangersgraben.com; gil@gillamsmithlaw.com; Jeannet Santos <jsantos@fr.com>
Subject: Re: Headwater v. Samsung, 2:23-cv-641: Samsung Notice and Subp to VIEN-PHUONG NGUYEN

Sara,

Mr. Nguyễn does not have one day with seven hours available for the foreseeable future. We suggest that you start the deposition one of the offered 4-hour days and then continue on a second day for the rest of the time if needed.

Paul Kroeger
(213) 864-5532
pkroeger@raklaw.com

On Dec 11, 2024, at 7:40 AM, Sara Fish <sfish@fr.com> wrote:

Paul and all,

Mr. Nguyen is a named inventor on an asserted patent in this case, and an inventor who has not previously been deposed in the prior matters, thus four hours of deposition availability is insufficient (and contrary to what is required by FRCP 30 and 45). Please provide Mr. Nguyen's availability in January for a day of up to full 7 hours of availability.

Thank you,

Sara C. Fish

Principal ■ Fish & Richardson
P.C. ■ Mobile: 770 403 0377

From: Paul Kroeger
<pkroeger@raklaw.com>
Sent: Tuesday, December 10, 2024 2:01 PM
To: Sara Fish <sfish@fr.com>
Cc: Ashley Bolt <bolt@fr.com>;
[SERVICE FR] Samsung-Headwater
<SERVICEFRSamsung-Headwater@fr.com>;
Cc: rak_headwater@raklaw.com <rak_headwater@raklaw.com>; melissa@gillamsmithlaw.com; gschmidt@hilgersgraben.com; gil@gillamsmithlaw.com; Jeannet Santos <jsantos@fr.com>
Subject: Re: Headwater v. Samsung, 2:23-cv-641: Samsung Notice and Subp to VIEN-PHUONG NGUYEN

Correct, pacific time. Mr. Ngyuen is available from 1 pm - 5pm PT on Friday the 20th.

Paul Kroeger
(213) 864-5532
pkroeger@raklaw.com

On Dec 9, 2024, at 12:19 PM,
Sara Fish <sfish@fr.com>
wrote:

Hi Paul,

What time could Mr. Nguyen be available to begin his deposition on the "afternoon" of December 20th? Would Mr. Nguyen be available for up to a full 7 hours of record

time from such start time?
Please also confirm he is still
located in California, thus all
times are in Pacific Time.

Thank you,

Sara C. Fish

Principal ■ Fish & Richardson
P.C. ■ Mobile: 770 403 0377

From: Paul Kroeger
<pkroeger@raklaw.com>
Sent: Friday, December 06,
2024 3:42 PM
To: Ashley Bolt
<bolt@fr.com>
Cc: [SERVICE FR]
Samsung-Headwater
<SERVICEFRSamsung-Headwater@fr.com>;
Cc: rak_headwater@raklaw.com<rak_headwater@raklaw.com>; melissa@gillamsmithlaw.com; gschmidt@hilgersgraben.com; gil@gillamsmithlaw.com; Jeannet Santos
<jsantos@fr.com>
Subject: Re: Headwater v.
Samsung, 2:23-cv-641:
Samsung Notice and Subp to
VIEN-PHUONG NGUYEN

Shley,

With regard to Mr Nguyen he
has limited availability until
the end of the year. He has
some availability on the
afternoons Monday and
Friday of the next two weeks.

Thanks,

**Jason
Wietholter
Russ, August &
Kabat**

12424 Wilshire
Boulevard, 12th
Floor | Los
Angeles, Californ
ia 90025
Main +1 310 826
7474 |
[jwietholter@rakl
aw.com](mailto:jwietholter@raklaw.com) |
www.raklaw.com

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Begin forwarded
message:

From: Ashley Bolt
<bolt@fr.com>
Subject: RE:
Headwater v.
Samsung, 2:23-

**cv-641: Samsung
Notice and Subp
to VIEN-
PHUONG
NGUYEN**

Date: December 2,
2024 at

9:42:59 AM CST

To: "jwietholter@raklaw.com"

<jwietholter@raklaw.com>, "

[SERVICE FR]

Samsung-
Headwater"

<SERVICEFRSamsung-Headwater@fr.com>

Cc: "rak_headwater@raklaw.com"

<rak_headwater@raklaw.com>, "

"melissa@gillamsmithlaw.com"

<melissa@gillamsmithlaw.com>, "

"gschmidt@hilgersgraben.com"

<gschmidt@hilgersgraben.com>, "

"gil@gillamsmithlaw.com"

<gil@gillamsmithlaw.com>, Jeannet

Santos

<jsantos@fr.com>

Counsel,

Following up on
my November 26
message below,
please provide

deposition
availability for Mr.
Nguyen in the
month of
December.

Thanks,
Ashley

**Ashley A
Bolt**

Principal ■ Fish
& Richardson
P.C.

M: 256 335 9252 |
bolt@fr.com

From: Ashley
Bolt
<bolt@fr.com>
Sent: Tuesday,
November 26,
2024 12:07 PM
To: [jwietholter@r
aklaw.com](mailto:jwietholter@raklaw.com);
[SERVICE FR]
Samsung-
Headwater
<[SERVICEFRSa
msung-
Headwater@fr.co
m](mailto:SERVICEFRSamsung-Headwater@fr.com)>
Cc: [rak_headwat
er@raklaw.com](mailto:rak_headwater@raklaw.com);
[melissa@gillams
mithlaw.com](mailto:melissa@gillamsmithlaw.com); [gsc
hmidt@hilgersgr
aben.com](mailto:gsc
hmidt@hilgersgraben.com); [gil@gi
llamsmithlaw.co
m](mailto:gil@gillamsmithlaw.com); Jeannet
Santos
<jsantos@fr.com>
>

Subject: RE:
Headwater v.
Samsung, 2:23-
cv-641:
Samsung Notice
and Subp to
VIEN-PHUONG
NGUYEN

Counsel,

Given that Mr. Nguyen objects to the deposition time, date, and location as set forth in Samsung's subpoena, please provide his availability for a deposition within the next 2-3 weeks.

Thanks,
Ashley

**Ashley A
Bolt**

Principal ■ Fish
& Richardson
P.C.

M: 256 335 9252 |
bolt@fr.com

From: Jason
Wietholter
<jwietholter@raklaw.com>

Sent: Monday,
November 25,
2024 11:04 PM

To: [SERVICE
FR] Samsung-
Headwater
<SERVICEFRSamsung-Headwater@fr.com>

Cc: rak_headwater@raklaw.com;
melissa@gillamsmithlaw.com; gscmidt@hilgersgraben.com; gil@gillamsmithlaw.com; Jeannet Santos

[<jsantos@fr.com>](mailto:jsantos@fr.com)

 \succ

Subject: Re:
Headwater v.
Samsung, 2:23-
cv-641:
Samsung Notice
and Subp to
VIEN-PHUONG
NGUYEN

[This email originated outside of F&R.]

Counsel,

Attached for service please find objections and responses to Samsung's subpoena to third party Vien-Phuong Nguyen.

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